

AMENDMENT  
SERIAL NO. 09/577,329  
Page 2

### Remarks

#### For the Claims:

In an Office Action Summary page of the 1 March 2004 Office Action, claims 1-3 and 5-9 were rejected, claims 4, 11, and 12 were objected to as being dependent upon rejected base claims, and claims 12 and 20 were allowed. However, review of the Detailed Action indicates that while claims 1-3 and 5-9 were indeed rejected, claims 4, 10, and 11 were actually objected to, and claims 12 through 20 were allowed. Accordingly, Applicant takes this latter position, i.e., claims 1-3 and 5-9 were rejected, claims 4, 10, and 11 were objected to, and claims 12 through 20 were allowed. Applicant acknowledges the allowance of claims 12-20, and respectfully requests reconsideration of claims 1-11 as originally filed, in view of the following remarks.

This Office Action has rejected claims 1-3 and 5-9 under 35 U.S.C. 103(a) as being unpatentable over *Chang et al.*, U.S. Pat. No. 6,463,270 (hereinafter *Chang*) in view of *Koster*, U.S. Pat. No. 6,356,756. *Chang* teaches of a method and a translation server (TS) for supporting non-geographic telephone numbers. *Koster* teaches of a method and system for routing calls to a wireless platform using local number portability searches.

For the Examiner's convenience, independent claim 1 is reproduced below as originally filed:

1. A method for establishing a call to a wireless directory number (DN) associated with a wireless mobile station, said wireless DN being one of a non-geographic DN and a non-dialable DN, said method comprising:  
receiving a local access DN at an originating switching node;

## AMENDMENT

SERIAL NO. 09/577,329

Page 3

identifying a signaling node associated with said local access DN;  
obtaining, from a database residing at a home location register, said wireless DN associated with said local access DN;  
utilizing said wireless DN to determine a route that includes said originating switching node and a visited switching node serving said wireless DN; and  
establishing a connection to said wireless mobile station via said determined route.

Regarding independent claim 1, the Office Action alleges that *Chang* includes a method of establishing a call to a wireless directory number associated with a wireless mobile station. The Office Action further alleges that *Chang* meets the claim 1 limitations of the identifying, obtaining, and utilizing activities. However, the Office Action acknowledges that *Chang* is concerned with connecting to the signaling network and is silent regarding establishing a connection to the mobile station via a determined network, as well as being silent on a local access directory number.

The Office Action also alleges that *Koster* discloses a method and system for routing calls to a wireless services platform that uses local number portability searches, thus *Koster* allegedly "handles" local access directory numbers. The Office Action asserts that *Koster* meets the limitations of the receiving and establishing activities of claim 1. The Office Action subsequently concludes that it would have been obvious to modify *Chang* to include means to handle local access numbers tied to non-geographic numbers as done by *Koster* so that *Chang* could handle all aspects of the call processing process.

*Chang* teaches of a translation server that performs a non-geographic telephone number (NGPN) -to- home location register (HLR) mapping. When a NGPN is presented to a switch, the switch

## AMENDMENT

SERIAL NO. 09/577,329

Page 4

holds the call and forwards the NGPN to a visitor location register (VLR). The VLR has a pointer or performs a hash function which forwards the NGPN to a translation server (TS). The TS includes a database, which receives the NGPN and looks up the identifier of the home location register (HLR) serving the NGPN. The TS forwards the identifier of the HLR to the VLR, and the VLR subsequently queries the HLR to determine how to route the call (col. 7, lines 3-15).

Applicant believes that the rejection of claim 1 in view of a combination of *Chang* and *Koster* is improper primarily because the rejection is based upon false characterizations about what the prior art fairly teaches to one skilled in the art. While certain things, discussed in detail below, are taught and claimed in Applicant's application, they are neither taught nor suggested in *Chang* and *Koster* in spite of the Office Action's allegations to the contrary. In particular, the claim 1 limitation of "obtaining, from a database residing at a home location register, said wireless DN associated with said local access DN" is neither disclosed nor implied in either the *Chang* or the *Koster* reference.

The Office Action cites the passage in the *Chang* reference at col. 7, lines 3-15, as an alleged teaching of the obtaining activity of claim 1. As shown above, the cited passage expressly teaches of accessing a database at a translation server to determine the home location register address associated with an NGPN. Consequently, a database resides at the translation server, not at the home location register as claimed. Nor does the database, residing at the *Chang* translation server, resemble or serve the purpose of Applicant's database of claim 1, residing at the home location register. Rather, the *Chang* TS obtains from

## AMENDMENT

SERIAL NO. 09/577,329

Page 5

its database an identifier of the home location register, when presented with the non-geographic phone number, rather than obtaining a wireless directory number associated with a local access number, as claimed in claim 1. Accordingly, *Chang* fails to meet the limitations set forth in the obtaining activity of claim 1.

Of course, the Office Action acknowledges that *Chang* is silent on any teaching of a local access directory number, but alleges that *Koster* teaches of a local access number. *Koster* teaches that Local Number Portability (LNP) allows a subscriber to change service providers and/or geographic location while retaining the same directory number. Accordingly, a caller can continue to dial the same directory number that a subscriber originally had, despite a new recipient switch serving the subscriber's phone. To that end, *Koster* teaches that when a call is originated at an originating switch, the switch first determines whether the number has been ported. If the directory number has been ported, the originating switch will receive a routing number of the recipient switch. The originating switch will then route the call to the recipient switch. The recipient switch translates the routing number to a directory number for a service platform, and the call is then routed to the service platform. The platform uses certain criteria to redirect calls (i.e., establish a connection) to a subscriber's home number, mobile number, or work number.

Consequently, even though *Koster* teaches of receiving one number (i.e., the subscriber's directory number) to obtain another number (i.e., the directory number for a service platform by translating the routing number of the recipient switch), the directory number is for the service platform rather than the

## AMENDMENT

SERIAL NO. 09/577,329

Page 6

wireless directory number associated with the wireless mobile station, as recited in claim 1. Moreover, this directory number for the service platform is not obtained from a database residing at a home location register, as recited in claim 1. Thus, *Koster* also fails to teach or suggest Applicant's obtaining activity of independent claim 1.

Moreover, *Koster* cannot be combined with *Chang* to yield the claim limitation of "obtaining, from a database residing at a home location register, said wireless DN associated with said local access DN." *Chang* and *Koster* cannot be combined to render obvious Applicant's invention of claim 1 because even if local number portability were employed in the *Chang* methodology, the *Chang* translation server would still access its database (not a database residing at a home location register). Such access would occur in response to the presented subscriber's ported wireless number to obtain an identifier of the home location register (not a wireless DN). Thus, the hypothetical combination of *Chang* and *Koster* fails to render obvious Applicant's invention of claim 1.

Nor has any line of reasoning has been provided to indicate why one skilled in the art would be motivated to make the changes required of *Chang* or *Koster* to cause them to more closely resemble Applicant's claimed invention. Applicant's invention of claim 1 has achieved the novel and non-obvious benefit of allowing a wireless mobile station to have a non-geographic or non-dialable wireless directory number associated with a local directory number for a geographic region. Such call processing implementation advantageously allows local access from a local calling area for that wireless station (page 30, lines 19-28).

## AMENDMENT

SERIAL NO. 09/577,329

Page 7

In contrast, when dialing the *Chang* non-geographic telephone number it cannot be readily ascertained by the caller whether the *Chang* non-geographic telephone number is a local call or a toll call. Similarly, when dialing the *Koster* subscriber's ported wireless number it cannot be readily ascertained by the caller whether the number is a local call or a toll call. If a caller cannot readily make that determination, a caller may be discouraged from dialing the *Chang* non-geographic telephone number and/or the *Koster* subscriber's ported wireless number. Obviously, such a situation is undesirable if the wireless directory number is a business number.

Notwithstanding the lack of prior knowledge as to whether the call is a local or a toll call, since *Chang* can already successfully obtain the appropriate information from the translation server to establish communication between the home location register and a visiting location register in order to determine routing for a call, there is no motivation to modify the *Chang* system to more closely resemble Applicant's obtaining activity of claim 1.

In general, Applicant believes that, none of the cited references teaches or suggests that which Applicant has claimed in claim 1. As stated in W.L. Gore & Associates, Inc. v. Garlock, Inc., 220 USPQ 303, 312-313 (Fed. Cir. 1983) cert. denied 469 U.S. 851 (1984):

To imbue one of ordinary skill in the art with knowledge of the invention in suit, when no prior art reference or references of record convey or suggest that knowledge, is to fall victim to the insidious effect of a hindsight syndrome wherein that which only the inventor taught is used against its teacher.

## AMENDMENT

SERIAL NO. 09/577,329

Page 8

Indeed, it is Applicant's specification and not the prior art which teaches of "obtaining, from a database residing at a home location register, said wireless DN associated with said local access DN" as claimed in claim 1. Moreover, a combination of the *Chang* and *Koster* references cannot teach that which neither *Chang* nor *Koster* teach. Furthermore, the Examiner has provided no line of reasoning to indicate why one skilled in the art would be motivated to make the changes required of *Chang* or *Koster* to cause them to more closely resemble Applicant's claimed invention. Rather, it is only Applicant's specification which teaches doing that which Applicant claims.

Accordingly, Applicant believes that *Chang* and *Koster* cannot be combined to render obvious Applicant's invention of claim 1. As such, claim 1, as originally filed, is believed to be allowable. Applicant respectfully requests the withdrawal of the rejection of claim 1 under 35 U.S.C. 103(a) over a combination of *Chang* and *Koster* for the reasons set forth above. Claims 2-11 depend directly or indirectly from claim 1. Accordingly, Applicant also believes claims 2-11 are allowable for the reasons set forth above.

Accordingly, claims 1-11 remain in the application as originally filed and are believed to be allowable. In addition, previously allowed claims 12-20 remain in this application as originally filed.

Applicant believes that the foregoing remarks are fully responsive to the rejections recited in the 1 March 2004 Office Action and that the present application is in a condition for allowance. Accordingly, reconsideration of the present application is respectfully requested. To the extent necessary,


AMENDMENT

SERIAL NO. 09/577,329

Page 9

a petition for extension of time under 37 C.F.R. § 1.136(a) is hereby made, the fee for which should be charged to Patent Office deposit account number 07-2347.

Respectfully submitted,

  
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